

JAMES P. KEMP, ESQUIRE
 Nevada Bar No. 006375
 KEMP & KEMP, ATTORNEYS AT LAW
 7435 W. Azure Drive, Suite 110,
 Las Vegas, NV 89130
 (702) 258-1183 tel./ (702) 258-6983 fax
jp@kemp-attorneys.com
 Attorney for Plaintiff Sonny Gubbine

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SONNY GUBBINE)	Case No. 2:21-cv-02078-JAD-EJY
)	
Plaintiff,)	
vs.)	STIPULATION AND ORDER TO
)	EXTEND TIME FOR PLAINTIFF
HOLDER CONSTRUCTION GROUP, LLC,)	TO RESPOND TO
a Georgia Limited Liability Company; DOES)	DEFENDANTS' MOTION FOR
I-X; ROE BUSINESS ENTITIES I-X,)	SUMMARY JUDGMENT
)	(FIRST REQUEST)
Defendants)	
_____)	ECF No. 54

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No.49) from the current due date of Wednesday, April 10, 2024 through and including **Wednesday, April 17, 2024.**

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel has been working on the Opposition to Defendant's Motion for Summary Judgment and discovered that he needed to order two deposition transcripts and was not able to receive them until the day of the current deadline, April 10, 2024, and needs to go through those depositions to respond to the Motion for Summary Judgment;

2. Additionally, Plaintiff's counsel needs more time to confer and work with Mr. Gubbine to prepare the Opposition including a declaration from Mr. Gubbine;

3. An extension of one week to April 17, 2024 will be sufficient to finish the Opposition to the Motion for Summary Judgment.

This stipulation to extend the deadline is made in good faith and not for purposes of delay.

April 10, 2024.

KEMP & KEMP

FISHER & PHILLIPS LLP

By: /s/ James P. Kemp, Esq.
7435 W. Azure Dr.
Suite 110
Las Vegas, Nevada 89130
Attorneys for Plaintiff

By: /s/ Scott M. Mahoney, Esq.
300 South Fourth Street
Suite 1500
Las Vegas, Nevada 89101
Attorneys for Defendants

IT IS SO ORDERED:



DISTRICT JUDGE

4/16/24

Dated: _____

KEMP & KEMP
ATTORNEYS AT LAW
7435 W. Azure Drive, Suite 110
LAS VEGAS, NEVADA 89130
Tel. (702) 258-1183 • Fax (702) 258-6983